REMARKS

In the Office Action dated July 3, 2002, the Examiner rejected claims 1 through 9 under 35 USC 102(e) as anticipated by the Perrone US Patent No. 6,157,705. Additionally, claim 10 was rejected under 35 USC 103(a) as unpatentable over Perrone in view of Stubley et al, US Patent No. 6, 092,045.

The rejection of claims 1 through 9 based on Perrone has been overcome by the above amendments. The present invention is primarily for locating items, that is item directories which direct a user such as a consumer or shopper to a specific location to view, retrieve or purchase the product. See page 2, lines 6 through 15 and page 26 line 4 through page 27 line 4 of the present application. Hence, the present invention is now specifically set forth in the claims as directed to the location of consumer products.

Unlike the present invention as now claimed, the primary reference to Perrone is directed to voice control of a server for ordering products through the internet where virtual presentation occurs. The Examiner has cited column 19, line 35 of Perrone for using the Perrone system to show locations of a class of rooms. This is done in the form of a diagram to show room availability by grouping. It does not show the location of a specific person or product, much less a consumer product. There is a significant difference between directing a consumer to an aisle and shelf designation to pick up a specific product and showing a diagram

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of a block of rooms in a hotel. In other words, the Perrone patent was a massive 19 column disclosure, but nowhere teaches or renders obvious present invention as now claimed.

In addition to the above, the limitations of the original claim 10 are now set forth in new claim 11.

The secondary reference to Stubley et al does not overcome any of the shortcomings set forth in the Perrone patent. Further, because Perrone has its own Functional Natural Language Phrase Interactive Voice Response System, there is no motivation or reason to substitute the speech recognition system of Stubley et al in the Perrone system. Applicant admits that Hidden Markov models are known, but not in the context of the present invention systems. Separate and apart from the foregoing, enclosed herewith is a Declaration under 37 C.F.R. Section 1.132, by the inventor herein, in support of unobviousness of the present invention.
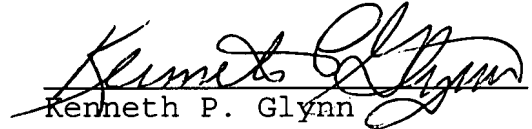
Also enclosed herewith are Submission of Formal Drawings, Petition for Extension of Time and the appropriate statutory fee.

In view of the above amendments, response and enclosures, it is urged that claims 11 through 30, the only claims remaining in the case, are in condition for allowance, and an early and favorable response is, therefore, earnestly solicited.

Thank you.

Respectfully Submitted,

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